

1 ROBERT SIEGEL (S.B. #64604)
rsiegel@omm.com
2 O'MELVENY & MYERS LLP
400 South Hope Street
3 Los Angeles, California 90071-2899
Telephone: (213) 430-6000
4 Facsimile: (213) 430-6407

5 ADAM P. KOHSWEENEY (S.B. #229983)
akohsweeney@omm.com
6 SUSANNAH K. HOWARD (S.B. #291326)
showard@omm.com
7 O'MELVENY & MYERS LLP
Two Embarcadero Center, 28th Floor
8 San Francisco, California 94111-3823
Telephone: (415) 984-8912
9 Facsimile: (415) 984-8701

10 Attorneys for Defendant
US Airways, Inc.

11 **Additional counsel listed on the following page*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14

15 JOSEPH TIMBANG ANGELES, NOE
16 LASTIMOSA, on behalf of themselves and on
behalf of others similarly situated, and the
17 general public,

18 Plaintiffs,

19 v.

20 US AIRWAYS, INC., and DOES 1 through 50,

21 Defendants.

Case No. 3:12-cv-05860 CRB

**JOINT STIPULATION TO CONTINUE
DEPOSITION DEADLINE**

Judge: Hon. Charles Breyer

1 Arlo García Uriarte, SBN 231764
Un Kei Wu, SBN 270058
2 Ernesto Sanchez, SBN 278006
Brent A. Robinson, SBN 289373
3 LIBERATION LAW GROUP, P.C.
2760 Mission Street
4 San Francisco, CA 94110
Telephone: (415) 695-1000
5 Facsimile: (415) 695-1006

6 Attorneys for Plaintiffs
Joseph Timbang Angeles and Noe Lastimosa
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Plaintiffs Joseph Timbang Angeles and Noe Lastimosa (“Plaintiffs”) and Defendant US
 2 Airways, Inc. (“US Airways”), by and through their respective counsel, hereby stipulate as
 3 follows:

4 **WHEREAS**, on July 20, 2016, the Court revised the following deadlines pursuant to joint
 5 stipulation by the Parties to this action as follows:

6 **August 1, 2016:** Deadline to complete depositions.

7 **October 7, 2016:** Deadline to file motion for decertification of class and for
 8 summary judgment.

9 **October 21, 2016:** Oppositions due.

10 **October 28, 2016:** Replies due.

11 **November 18, 2016:** Hearing on the parties’ motion for summary judgment on
 12 Plaintiffs’ Second Cause of Action and/or US Airways’
 13 motion for decertification.

14 **WHEREAS**, on July 19, 2016, US Airways served class member, Alvin Santillan with a
 15 subpoena to testify at a deposition, setting the deposition date as July 28, 2016.

16 **WHEREAS**, Mr. Santillan communicated to Plaintiffs’ counsel that he would be out of
 17 town on July 28, 2016, but that he would be available to be deposed in August.

18 **WHEREAS**, counsel for US Airways agreed to reschedule Mr. Santillan’s deposition for
 19 a date in August.

20 **WHEREAS**, counsel for Plaintiffs has reached out to Mr. Santillan and is awaiting
 21 confirmation of dates in August when he will be available.

22
 23 **NOW, THEREFORE**, the parties hereby file this Joint Stipulation, requesting that the
 24 deadline to complete depositions be modified from August 1, 2016 to August 31, 2016, for the
 25 sole purpose of accommodating the deposition of Mr. Santillan. All of the other above-listed
 26 deadlines shall remain the same.

1 Dated: August 1, 2016

2 ROBERT SIEGEL
3 ADAM P. KOHSWEENEY
4 SUSANNAH K. HOWARD
5 O'MELVENY & MYERS LLP

6 By: /s/ Susannah K. Howard
7 Susannah K. Howard
8 Attorneys for Defendant
9 US Airways, Inc.

10 Dated: August 1, 2016

11 LIBERATION LAW GROUP, P.C.
12 ARLO GARCIA URIARTE
13 BRENT ROBINSON

14 By: /s/ Arlo Garcia Uriarte
15 Arlo Garcia Uriarte
16 Attorneys for Plaintiffs Joseph Timbang
17 Angeles and Noe Lastimosa
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION OF FILING

Pursuant to Local Civil Rule 5-1(i)(3), I, Susannah K. Howard, hereby attest that concurrence in the filing of this Stipulation has been obtained from each of the other signatories listed above.

Dated: August 1, 2016

ROBERT SIEGEL
ADAM P. KOHSWEENEY
SUSANNAH K. HOWARD
O'MELVENY & MYERS LLP

By: /s/ Susannah K. Howard
Susannah K. Howard
Attorneys for Defendant
US Airways, Inc.